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July 25, 2017

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Acting General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

OFFICE OF GENERAL
COUNSEL

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FEDERAL ELECTION
COMMISSION

Re: Response in MUR 7254

Dear Ms. Stevenson,

This Response is submitted by the undersigned counsel on behalf of Revv, LLC ("Revv") and its individual owners and operators in response to the Complaint designated as Matter Under Review 7254.

Revv operates an industry-leading online donation platform for political committees and nonprofit organizations. Revv works as a page builder tool, which allows clients to build landing pages on their website with forms to accept online donations.

Revv utilizes the services of a payment processing service called Stripe, which is a PCI-compliant suite of APIs used by some of the largest companies in the world to process credit card payments. On or about June 16, 2016, Stripe authenticated and processed a charge from the Complainant, which included Card Verification Code (CVC). Under broad industry standards, Revv received a proper authorization for the Complainant's charge from its payment processor. Revv had no reason to believe the charge was fraudulent and no reason to suspect "the use of stolen personal information to funnel illegal funds to campaigns." Complaint at 3. Accordingly, Revv processed Ms. Jones's \$5 charge and then generated and sent an automated emailed contribution receipt to Ms. Jones. (The contents of the automated email receipt were provided by Revv's client.)

Political committees are responsible for processing refund requests. Nevertheless, Revv provides several means for donors to seek assistance. Revv's support website prominently displays a method for donors and clients to submit requests, Revv provides a webpage that addresses the question "How do I request a refund?", Revv's website includes a "Still need more help?" section which allows donors to email their requests to donations@revv.co, and Revv even has a Twitter handle (@RevvSupport) that can be used to seek assistance. To the best of our knowledge, Ms. Jones did not use any of these resources. Rather, Ms. Jones replied to an

automated email address (confirmation@revv.co) that is used to send charge receipts, and which is not monitored for replies.

Upon being notified of Ms. Jones' complaint by the Commission and learning of her concerns, Revv contacted its client, Donald J. Trump for President, Inc., to authorize a refund of Ms. Jones' \$5 contribution, obtained that authorization, and then processed a refund of \$5 to Ms. Jones on July 13, 2017. The \$5 contribution that the Complainant says she did not intend to make has been refunded.

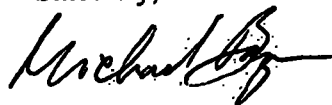
In her Complaint, Ms. Jones describes several grievances, but the Complaint does not contain any discernible allegation of a violation of the Federal Election Campaign Act by Revv or any of its individual owners and operators. The Complaint does not satisfy the minimum standards set forth in Commission regulations because it does not include "a clear and concise recitation of the facts *which describe a violation of the statute or regulation over which the Commission has jurisdiction.*" 11 C.F.R. § 111.4(d)(3) (emphasis added).

Ms. Jones' allegation that Revv's donation platform contains "no ability to donate in increments less than \$10 and [that] there was no way to write in a donation" is simply incorrect. Ms. Jones complains that Revv's donation "platform does not provide a way to 'unsubscribe' from a donation via the confirmation email," but does not allege that Revv's donation platform in any way fails to conform to all applicable Commission requirements. Revv had no involvement in Ms. Jones' inaugural invitation mailing and has no information about that mailing.

In short, Ms. Jones's various allegations do not involve violations of the Federal Election Campaign Act, Commission regulations, or any Commission precedent. Nevertheless, Revv has already reached out to its client, Donald J. Trump for President, Inc., to arrange for a refund of Ms. Jones's \$5 contribution, which was processed on July 13, 2017.

For the reasons forth above, the Complaint filed in this matter should be dismissed. Please feel free to contact us if you have any questions or require any additional information.

Sincerely,



Michael Bayes
Jessica F. Johnson
HOLTZMAN VOGEL JOSEFIK TORCHINSKY PLLC